

<p>1 UNITED STATES DISTRICT COURT DISTRICT OF SOUTH DAKOTA</p> <p>2 *****</p> <p>3 FERRIS JOSEPH, Civ. No. 06-4143</p> <p>4 Plaintiff,</p> <p>5 vs.</p> <p>6 CORPORATION OF THE PRESIDENT CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah corporation sole, and CORPORATION OF THE PRESIDING BISHOP OF THE CHURCH OF LATTER-DAY SAINTS, a Utah corporation sole,</p> <p>7 McMahon Law Office Sioux Falls, SD March 26, 2007 10:00 a.m.</p> <p>8 *****</p> <p>9 DEPOSITION OF</p> <p>10 FERRIS FRANCIS JOSEPH, JR.</p> <p>11 *****</p> <p>12 <u>APPEARANCES</u></p> <p>13 Mr. Stuart S. Mermelstein Herman & Mermelstein, P.A. 18205 Biscayne Boulevard, Suite 2218 Miami, FL 33160</p> <p>14 for the Plaintiff;</p> <p>15 Mr. James E. McMahon McMahon Law Office PO Box 1293 Sioux Falls, SD 57101</p> <p>16 for the Defendants;</p>	<p>1 INDEX OF EXAMINATIONS</p> <p>2 By Mr. McMahon Page 4</p> <p>3 *****</p> <p>4 INDEX OF DEPOSITION EXHIBITS</p> <table border="1"> <thead> <tr> <th></th> <th>Marked for Identification</th> <th>Offered into Evidence</th> </tr> </thead> <tbody> <tr> <td>Exhibit 1 -- Complaint</td> <td>76</td> <td>--</td> </tr> <tr> <td>Exhibit 2 -- Copy of photograph</td> <td>76</td> <td>--</td> </tr> <tr> <td>Exhibit 3 -- Certificate of Record of Membership</td> <td>117</td> <td>--</td> </tr> <tr> <td>Exhibit 4 -- Document entitled Elder White Incident</td> <td>117</td> <td>--</td> </tr> <tr> <td>Exhibit 5 -- Photograph</td> <td>120</td> <td>--</td> </tr> <tr> <td>Exhibit 6 -- CHR records</td> <td>142</td> <td>--</td> </tr> <tr> <td>Exhibit 7 -- LDS records</td> <td>142</td> <td>--</td> </tr> <tr> <td>Exhibit 8 -- Southeastern records</td> <td>142</td> <td>--</td> </tr> </tbody> </table> <p>21 *****</p> <p>22 Joseph Deposition Exhibits 1-4, 6-8 were retained with the original transcript. Deposition Exhibit Number 5 was retained by Mr. Mermelstein. The original transcript of this deposition was delivered to Mr. McMahon.</p> <p>23 *****</p>		Marked for Identification	Offered into Evidence	Exhibit 1 -- Complaint	76	--	Exhibit 2 -- Copy of photograph	76	--	Exhibit 3 -- Certificate of Record of Membership	117	--	Exhibit 4 -- Document entitled Elder White Incident	117	--	Exhibit 5 -- Photograph	120	--	Exhibit 6 -- CHR records	142	--	Exhibit 7 -- LDS records	142	--	Exhibit 8 -- Southeastern records	142	--
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<p>1 APPEARANCES - Continued</p> <p>2</p> <p>3 Mr. Jonathan A. Kobes Murphy, Goldhammer & Prendergast PO Box 1728 Sioux Falls, SD 57101</p> <p>4 for the Defendants;</p> <p>5</p> <p>6 Mr. Randy T. Austin Kirton & McConkie 1800 Eagle Gate Tower Salt Lake City, UT 45120</p> <p>7 for the Defendants.</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 S T I P U L A T I O N</p> <p>2 It is hereby stipulated and agreed, by and</p> <p>3 between the above-named parties through their</p> <p>4 attorneys of record, whose appearances have been</p> <p>5 hereinabove noted, that the deposition of FERRIS</p> <p>6 FRANCIS JOSEPH, JR. May be taken at this time and</p> <p>7 place, that is, at the McMahon Law Office, Sioux</p> <p>8 Falls, South Dakota, on the 26th of March, 2007,</p> <p>9 commencing at the hour of 10:00 a.m.; said</p> <p>10 deposition taken before Suzanne Brudigan, RPR,</p> <p>11 CSR, a Notary Public within and for the State of</p> <p>12 South Dakota; said deposition taken for the</p> <p>13 purpose of discovery or for use at trial or for</p> <p>14 each of said purposes, and said deposition is</p> <p>15 taken in accordance with the applicable Rules of</p> <p>16 Civil Procedure as if taken pursuant to written</p> <p>17 notice. Objections, except as to the form of the</p> <p>18 question, are reserved until the time of trial.</p> <p>19 FERRIS FRANCIS JOSEPH, JR.,</p> <p>20 called as a witness, being first duly sworn,</p> <p>21 testified as follows:</p> <p>22 EXAMINATION BY MR. MCMAHON:</p> <p>23 Q. Would you state your full name, please.</p> <p>24 A. Ferris Francis Joseph, Jr.</p> <p>25 Q. What's your current address?</p>																											



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1 missionaries?

2 A. **Never -- I don't remember anytime overnight.**

3 Q. All right. Then let's -- let's get to the place

4 where this alleged abuse in the complaint took

5 place. Tell me where that happened.

6 A. **In their residence.**

7 Q. Was it always in the residence?

8 A. **I believe so, yes.**

9 Q. As far as you can recall, that's where it always

10 happened?

11 A. **Yes.**

12 Q. All right. And where was that residence?

13 A. **I remember them living in Flandreau.**

14 Q. Okay. Did they live in an apartment or a house,

15 or tell me as much as you can remember about it?

16 A. **My memories is an apartment.**

17 Q. An apartment as part of an apartment complex, is

18 that what you mean?

19 A. **I don't remember.**

20 Q. Do you remember if it was in a house versus an

21 apartment or can't you draw that distinction?

22 A. **I can't.**

23 Q. Do you have any recollection of what part of town

24 it was in?

25 A. **I don't.**

82

1 Q. Can you describe the building for me?

2 A. **I can't.**

3 Q. How many times do you think you were at that

4 residence?

5 A. **I don't recall. It was more than a few.**

6 Q. I just need to have some -- some type of a

7 feeling. I'm not trying to pin you down to exact

8 number of times because I know you couldn't

9 remember that, but if we started at ten and 50,

10 I'm assuming maybe we should start at five and

11 50. Is it somewhere in between there?

12 A. **Five and 50?**

13 Q. Yeah.

14 A. **I would say more than five.**

15 Q. Okay. Do you think it's 10? 20? 15? I mean, 40?

16 I'm just looking for some idea.

17 A. **I can't give an exact.**

18 Q. All right. Do you have any idea how long these

19 two missionaries were visiting you and your

20 family in a period of time? Were they here for a

21 year, two years, three years? What was it?

22 A. **I believe a few months.**

23 Q. Okay. If they were here for a few months, you

24 said that it was probably a couple months before

25 you started going places with them so does that

83

1 leave us, what, two, three, four months that they

2 were here after that?

3 A. **I don't know.**

4 Q. Okay. If we try to break it down into a week,

5 for example, would you go to Flandreau with them

6 every week to their residence?

7 A. **I don't know.**

8 Q. Would you go there at least once a month with

9 them?

10 A. **I believe so.**

11 Q. Okay. When you went to their residence, both

12 missionaries went with you?

13 A. **Yes.**

14 Q. What type of vehicle did you ride in?

15 A. **It wasn't a truck, it was a car.**

16 Q. Okay. Do you remember what kind?

17 A. **I don't.**

18 Q. Do you remember what color?

19 A. **I don't.**

20 Q. Just a two-door or four-door?

21 A. **I don't know.**

22 Q. Big car, little car?

23 A. **I don't know. Mid-sized, perhaps.**

24 Q. Mid-sized car?

25 A. **Perhaps.**

84

1 MR. MERMELSTEIN: Object. I don't think

2 they had little cars in the mid '60s.

3 MR. AUSTIN: Beatles.

4 MR. McMAHON: They had VWs back then.

5 And you don't remember anything about the

6 color?

7 A. **I don't.**

8 Q. On each occasion that you went to their residence

9 in Flandreau, was it always you and your two

10 brothers?

11 A. **Not always.**

12 Q. Did you ever go alone or was there always at

13 least one of your brothers that went?

14 A. **I don't recall.**

15 Q. When you went to the residence, tell me what you

16 remember that would happen. In other words, if

17 they lived in an apartment, I'm assuming there

18 was more than one room in the apartment; is that

19 correct?

20 A. **I believe so.**

21 Q. Okay. So we've got two missionaries and you and

22 your brothers, for an example, and you would go

23 to their residence. Tell me then what happened

24 and how it was that this abuse occurred.

25 A. **I remember one time when he would have me and I**

85

1 believe -- I believe my brothers kind of
 2 playing -- being roughhoused, wrestling around.
 3 I remember another time when -- I remember
 4 when -- I remember when I was anally penetrated.
 5 Q. Mr. Joseph, this is obviously difficult for you
 6 and I understand that. I hope you understand
 7 that for me to represent my client, I need to
 8 know what happened. And if you want to take a
 9 break or something, that's fine but we have to go
 10 through this so I know the extent of what
 11 happened. And as I said before, I'm not -- I'm
 12 not trying to embarrass you, I'm just trying to
 13 find out the facts, okay?
 14 A. (Indicating.)
 15 Q. Let's start with the time that you remember of
 16 the roughhousing. Can you tell me what happened
 17 there?
 18 A. I recall he had me play with his pecker.
 19 Q. Now, would this have been when it was just the
 20 two of you or would your brothers have been there
 21 at the same time?
 22 A. I remember we were -- we roughhoused -- we were
 23 playing around together, but I don't recall if my
 24 brothers were with me during that incident.
 25 Q. And did he take his penis out of his pants?

86

1 A. I don't recall.
 2 Q. You just remember that you -- did he ask you to
 3 play with it or fondle it in some way?
 4 A. I remember being in his bedroom.
 5 Q. Okay. You don't remember if it was through his
 6 pants or -- or whether he was undressed?
 7 A. I remember touching his pecker, undressed.
 8 Q. Undressed?
 9 A. Yes.
 10 Q. All right. You don't remember how you got there?
 11 I mean, if you were roughhousing, I'm trying to
 12 understand how you got from that to the bedroom.
 13 A. I believe it started with an activity during the
 14 day is what I remember, which eventually led to
 15 their -- their apartment which eventually led to
 16 playing or roughhousing in the apartment and then
 17 I remember me being in the bedroom with him.
 18 Q. And that's what I'm trying to figure out is
 19 whether you remember how it -- it progressed from
 20 roughhousing into you being in his bedroom alone
 21 with him?
 22 A. I don't.
 23 Q. All right. It was just the two of you as far as
 24 you remember in his bedroom on that occasion?
 25 A. I believe so.

87

1 Q. And however it happened, he had you playing with
 2 his penis?
 3 A. Yes.
 4 Q. All right. Do you have any conception of how
 5 long that lasted?
 6 A. I don't.
 7 Q. Okay. Now, before you mentioned that you
 8 remember one time being anally penetrated, before
 9 we talk about that, were there any other
 10 incidences that you remember other -- that
 11 involved some type of improper activity?
 12 A. Yes.
 13 Q. There was more than those?
 14 A. Yes.
 15 Q. All right. Let's then talk about the time that
 16 you remember being anally penetrated. What
 17 happened there?
 18 A. I remember it hurt.
 19 Q. Was that at his residence again?
 20 A. Yes.
 21 Q. Were you in his bedroom?
 22 A. Yes.
 23 Q. Do you remember how you got there?
 24 A. I don't recall but it -- it may have been similar
 25 to the time when I was in there playing with his

88

1 pecker.
 2 Q. This is a separate occasion, right?
 3 A. Yes.
 4 Q. And was it just the two of you that were in his
 5 bedroom at that time?
 6 A. I believe so.
 7 Q. And did he penetrate you with his penis or with a
 8 finger or what did he do?
 9 A. I remember his penis. And I remember it hurting.
 10 Q. Did you tell him it hurt?
 11 A. I believe so. I don't know for sure.
 12 Q. Did you ever have to get any kind of medical
 13 attention because of that?
 14 A. Like later in life?
 15 Q. No. I mean, did you bleed at all, do you know?
 16 A. I don't recall.
 17 Q. Okay. So you didn't have to go to the doctor
 18 because you were bleeding or anything like that?
 19 A. Right after?
 20 Q. Right.
 21 A. No.
 22 Q. Okay. Do you have any conception of how long
 23 that lasted?
 24 A. I don't.
 25 Q. How many other incidents of inappropriate conduct

89

1 were there?

2 A. I remember another incident where he had me do

3 oral on him.

4 Q. Where did this fit -- I'm assuming the fondling

5 would have been first?

6 A. I don't recall.

7 Q. Okay. Was the -- he wanted you to give him oral

8 sex?

9 A. I remember.

10 Q. Was that at his residence also?

11 A. Yes.

12 Q. And was that in his bedroom?

13 A. I believe so.

14 Q. Was anyone else present?

15 A. In the bedroom?

16 Q. Right.

17 A. I don't believe so.

18 Q. Okay. And, again, let me just ask you: Do you

19 remember how it is you ended up in the bedroom

20 with him alone?

21 A. I don't recall that.

22 Q. How long did that last, do you know?

23 A. I don't recall.

24 Q. Do you remember any other incidents?

25 A. I have recollections of touching his pecker.

90

1 Q. On other occasions?

2 A. Yes.

3 Q. Through his clothes or bare?

4 A. Bare.

5 Q. At his residence again?

6 A. I believe so.

7 Q. You say you have some recollection of that. Do

8 you remember any of the specifics?

9 A. I don't.

10 Q. You just have a recollection that you did it

11 other times, you touched it other times?

12 A. I do.

13 Q. Do you have any recollection of how many other

14 times?

15 A. I don't.

16 Q. Any estimate at all?

17 A. I don't know.

18 Q. And then you have recollection of one incidence

19 of oral sex and one incidence of anal sex?

20 A. Yes.

21 Q. No others?

22 A. I don't know.

23 Q. None that you remember anyway?

24 A. Yes.

25 Q. Now, during -- during these incidents, some of

91

1 the time your brothers were there, if I

2 understand you correctly; is that right?

3 A. I believe so.

4 Q. So where would they have been when this was

5 happening?

6 A. Probably -- probably the same place his companion

7 was.

8 Q. Do you know where that was?

9 A. Not in the bedroom.

10 Q. But they were in the residence, just not in the

11 bedroom?

12 A. I believe so.

13 Q. On every occasion, the companion and your

14 brothers would have been in one of the other

15 rooms?

16 A. Companion, yes. Brothers, I don't know.

17 Q. As far as you know, they were in one of the other

18 rooms?

19 A. I don't recall that.

20 Q. Okay. Did you --

21 A. I don't know if they were there every time that I

22 was.

23 Q. Okay. If they were there, they were in one of

24 the other rooms?

25 A. Yes.

92

1 Q. After any of these incidents, did you ever come

2 out and say anything to the companion that this

3 person was doing this to you?

4 A. I did not.

5 Q. Did you ever say anything to your brothers?

6 A. I did not.

7 Q. I've seen some mention in here that you have said

8 that your brothers were also abused; is that

9 correct?

10 A. I believe so, but Michael's dead. My brother

11 Randy and I have after -- after this came out of

12 regression, I talked with him and he stated to me

13 he was also abused.

14 Q. You guys had that conversation, as I recall,

15 right after Michael committed suicide and you

16 guys were wondering if this was a part of that?

17 A. No.

18 Q. Oh, you didn't?

19 A. No.

20 Q. Did you tell a therapist that?

21 A. No.

22 Q. Okay. But did you not think that Michael's

23 suicide might have been involved with some abuse?

24 A. I don't -- I never thought about it.

25 Q. That's never crossed your mind?

77

1 home. I think that pretty much corresponds with
 2 what you were telling me. Do you think that's
 3 about right, seeing that allegation you would
 4 have been about 12 when those missionaries first
 5 came to your home?
 6 A. Eleven or 12, I believe.
 7 Q. Okay. All right. Then let's pick up for a
 8 second where we were when we broke. I was trying
 9 to get you to recall if you did, where else you
 10 might have seen those missionaries besides your
 11 home and in church. Did you have a chance to
 12 think about that and visit with your counsel
 13 about that?
 14 A. Yes.
 15 Q. Can you tell me where else you saw those two
 16 missionaries?
 17 A. They would take us on activities, me and my two
 18 brothers.
 19 Q. Okay. Can you give me an approximation of how
 20 long it would have been from the first time they
 21 came to your home until you started going places
 22 with them? I know you won't remember exactly but
 23 can you give me some feel for that?
 24 A. I can't.
 25 Q. Do you think that would have been weeks or

78

1 months?
 2 A. I believe maybe couple months.
 3 Q. Okay.
 4 A. Maybe more.
 5 Q. So going from that time period a couple months,
 6 for the first couple months it would have been
 7 mostly visits in the home and seeing them in
 8 church, I take it, correct?
 9 A. I believe so.
 10 Q. All right. And then sometime around that
 11 two-month time period, that's just an
 12 approximation, I understand that, you started
 13 going places with the -- with these missionaries,
 14 correct?
 15 A. I believe so, yes.
 16 Q. And when you would go places with them, would it
 17 be just you or would some of your brothers and
 18 sisters go with you?
 19 A. Would be me and my two brothers.
 20 Q. Okay. And would you go with both missionaries or
 21 just one?
 22 A. Always two.
 23 Q. Always two. Can you tell me the various places
 24 that you remember that they took you?
 25 A. I remember the park in Sioux Falls and in

79

1 Flandreau.
 2 Q. Do you remember anyplace else you went with them?
 3 A. I remember they would buy us treats at times.
 4 Q. Okay.
 5 A. I remember -- I remember there was a place in
 6 Flandreau where we used to get popcorn, and it
 7 could have been a movie theater but I don't know
 8 for sure.
 9 Q. You don't remember going to any movies there?
 10 A. I don't remember. I don't recall.
 11 Q. Okay. So there was a park in Sioux Falls. Was
 12 that McKennan Park?
 13 A. I don't know.
 14 Q. All right. What would you do at the park in
 15 Sioux Falls now?
 16 A. Kick a ball around. I remember throwing
 17 frisbees. We'd do activities.
 18 Q. Was there anything inappropriate that ever
 19 happened in the park in Sioux Falls?
 20 A. I don't recall.
 21 Q. You don't remember any?
 22 A. No.
 23 Q. All right. You also said that there was a park
 24 in Flandreau that they would take you to. Was
 25 that just the town park?

80

1 A. I don't know if it was a park specifically.
 2 Q. What do you remember about it?
 3 A. It was an open field, area, grass.
 4 Q. What did you do there?
 5 A. We would kick -- kick ball, maybe play catch.
 6 Q. Same type of activities as you did in the park in
 7 Sioux Falls?
 8 A. Yes.
 9 Q. All right. I'll ask you the same thing about the
 10 park in Flandreau. Was there anything
 11 inappropriate in your opinion that happened at
 12 that park or open field?
 13 A. I don't recall, no.
 14 Q. Okay. Again, you don't remember anything
 15 happening there?
 16 A. No.
 17 Q. And then you mentioned you might have gone to the
 18 movie house, you don't remember much about that
 19 so I'm assuming, but correct me if I'm wrong,
 20 that you don't remember anything inappropriate
 21 happening at a movie house or anything like that?
 22 A. I don't recall.
 23 Q. All right.
 24 A. No.
 25 Q. Did you ever go anyplace overnight with these

93

- 1 A. Until -- until my abuse came out of regression, I
 2 never thought about it.
 3 Q. Oh, okay. And when was that?
 4 A. My abuse --
 5 Q. Yeah.
 6 A. -- coming out of regression? My trip up to
 7 Canada.
 8 Q. And you never thought about it before that?
 9 A. No.
 10 Q. You totally forgot about it?
 11 A. I -- I have no recollection of it prior to that
 12 point.
 13 Q. That's what I mean. Prior to your trip to
 14 Canada, you had forgotten that this had ever even
 15 happened to you?
 16 A. I had no recollection until my trip to Canada.
 17 Q. So you were 12 years old when this was going on.
 18 Do you remember talking about it with anyone back
 19 at that time?
 20 A. No. I have no memory of talking to anybody.
 21 Q. I have counseling records from three different
 22 places. Have you ever been in counseling other
 23 than those three places?
 24 A. I recall four.
 25 Q. Okay. Are you -- are you including Dr. Manlove?

94

- 1 A. Yes.
 2 Q. Okay. There would be four, then. Were there any
 3 others besides those four?
 4 A. No.
 5 Q. All right. What was the name of the missionary
 6 that was doing these things to you?
 7 A. Elder White.
 8 Q. Do you know his first name?
 9 A. He told our family his name was Robert.
 10 Q. Do you know his middle name?
 11 A. I do now. I didn't then. I had a recollection
 12 that it could have been the letter L but I didn't
 13 know for sure.
 14 Q. In your complaint you talk about a Richard,
 15 Richard Joseph White. How did you come up with
 16 that name?
 17 A. I didn't. The church did.
 18 Q. But I mean, this is a name the church gave you
 19 and so that's why it's in the complaint?
 20 A. Yes.
 21 Q. Do you know what Elder White's companion's name
 22 was?
 23 A. I do not.
 24 Q. You have no recollection of that at all?
 25 A. I do not.

95

- 1 Q. Did his companion ever do anything inappropriate?
 2 A. I remember nothing with the companion.
 3 Q. So as far as you know, the companion didn't do
 4 anything inappropriate?
 5 A. I believe so.
 6 Q. You believe that's correct?
 7 A. I believe so.
 8 Q. Yeah. So do you have any reason to believe that
 9 the companion was aware that Elder White was
 10 doing something inappropriate?
 11 MR. MERMELSTEIN: Objection to form.
 12 A. I believe he did.
 13 Q. Why do you believe he did?
 14 A. Because they were always together. They were --
 15 they were never alone. They went and did
 16 everything as two. When I was in their
 17 residence, he was there somewhere.
 18 Q. But if I understood you, he was never in the
 19 bedroom?
 20 A. Correct.
 21 Q. Okay. So are you just assuming that he knew it?
 22 I guess what I'm getting at is, did you ever see
 23 the companion watch or hear them talk about it or
 24 anything like that that makes you believe the
 25 companion knew about it?

96

- 1 A. I don't recall that.
 2 Q. Okay. What -- what's your understanding of what
 3 an elder is?
 4 A. Now presently?
 5 Q. Sure.
 6 A. He's a -- to me, he's an emissary of the church.
 7 Q. How do you get to be an elder?
 8 A. You kind of have to start out as a lower -- the
 9 lower priesthood, obtain the Melchizedek
 10 priesthood to become an elder.
 11 Q. Do you know what that entails?
 12 A. Yes.
 13 Q. What do you have to do?
 14 A. You have to -- you have to be living a pretty --
 15 supposedly a pretty moral life. You also have to
 16 go and obtain a lesser priesthood first which is
 17 the Aaronic. There's a couple three different
 18 stages, a deacon, teacher, priest in that
 19 priesthood, and then you receive the Melchizedek
 20 priesthood to become an elder.
 21 Q. So are all these people that go on missions, are
 22 they all elders?
 23 A. I believe so, except for the females.
 24 Q. So you obtain that at a fairly early age, then?
 25 A. Obtain?

97

- 1 Q. Being an elder?
- 2 A. You have to be a certain age to get the
- 3 Melchizedek priesthood.
- 4 Q. Do you know what that is?
- 5 A. I believe you have to be an adult.
- 6 Q. So 18?
- 7 A. Or older. A lot of people convert, convert at
- 8 all kinds of ages.
- 9 Q. Now, if we go back to 1967 when this was
- 10 happening to you, did you know what an elder was
- 11 back then?
- 12 A. I did not. I did not know what was required to
- 13 become an elder.
- 14 Q. Did this missionary call himself Elder White?
- 15 A. He was an elder, he was a missionary.
- 16 Q. Do you have to be an elder to be a missionary?
- 17 A. I know that he was a missionary and they were
- 18 called -- he was Elder White on his little name
- 19 tag.
- 20 Q. And how about, but you don't remember the name
- 21 tag of the other one?
- 22 A. I don't.
- 23 Q. Was he an elder, do you remember that?
- 24 A. Yes.
- 25 Q. Okay. But at that point in time, that didn't

98

- 1 mean anything to you?
- 2 A. No. Well, I didn't know what is involved with
- 3 becoming an elder, but it meant something to me.
- 4 You know, I looked up to those -- to those
- 5 missionaries. I considered them like a mentor,
- 6 somebody to be admired.
- 7 Q. You still have the complaint there in front of
- 8 you. Would you look at paragraph 12, please.
- 9 A. (Complies.)
- 10 Q. You say in that paragraph that the -- the
- 11 sexually, emotional and spiritual abuse committed
- 12 by White on Ferris was opening and long lasting.
- 13 What do you mean by "open and long lasting"?
- 14 A. I believe after going through therapy, I came to
- 15 understand -- I think I may have transitioned and
- 16 made a connection that this abuse affected me in
- 17 different ways over my entire life from the time
- 18 it happened forward until -- It came out of
- 19 regression but it was still subconsciously
- 20 affecting me when it was in regression. I
- 21 believe that I have low -- had low self-esteem
- 22 from it. I believe that I could not make
- 23 commitments. I believe I've become instable --
- 24 unstable because of it.
- 25 Q. Are these things that the therapist told you?

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- 1 A. These are things that I kind of concluded on my
- 2 own after the therapy sessions.
- 3 Q. Did you -- do you feel that there's anything else
- 4 in your life that has contributed to those same
- 5 problems?
- 6 A. No.
- 7 Q. When it says here that it was open, what do you
- 8 mean by "open"?
- 9 A. Open and long lasting?
- 10 Q. Yeah.
- 11 A. I believe from the age that it occurred, even
- 12 past the time of it coming out of regression,
- 13 even right now.
- 14 Q. Okay. I understand the long-lasting part. I'm
- 15 talking about the open part. You're not alleging
- 16 that these things happened in public, are you?
- 17 A. What do you -- I don't understand the question.
- 18 Q. Maybe I'm reading it wrong and maybe your
- 19 counsel --
- 20 MR. MERMELSTEIN: Is the question on the --
- 21 the abuse or the injuries? I think you're
- 22 referring to the abuse itself, right?
- 23 MR. McMAHON: Well, the allegation is
- 24 paragraph 12, sexually, emotional and spiritual
- 25 abuse committed. So I'm assuming that sexual,

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- 1 emotional and spiritual all modify abuse, and
- 2 then it says it was open and long lasting.
- 3 So I'm trying to get at what you mean by
- 4 being open and long lasting.
- 5 A. It's still affecting me.
- 6 Q. Okay. But it was all done in that bedroom?
- 7 A. To the best of my knowledge, I believe, yes.
- 8 Q. Okay. That paragraph goes on to state that the
- 9 church officials, administrators and supervisors
- 10 knew or should have known of this abuse. Do you
- 11 see where that's alleged there?
- 12 A. Yes.
- 13 Q. And how is it that they -- that you're claiming
- 14 that the church officials knew this?
- 15 A. I -- I believe that you just don't go on a
- 16 mission. My understanding is you have to be
- 17 called on a mission. You have to be living a
- 18 certain type of life. You're called. My
- 19 understanding is they go to a training place
- 20 somewhere in Provo, Utah, that preps them before
- 21 they go out on a mission. They're assigned to a
- 22 certain mission.
- 23 I remember the one in South Dakota being
- 24 linked to, I remember it was called Western
- 25 States, then Northern Indian Mission. They have